

Company Name:	GAC Education (GAC Education is a trading name of George Arthur Consultants LTD)
Model Policy No.	01
Model Policy Name:	GAC Education: Safeguarding & Child Protection Policy
Date:	May 2026

1. Policy Statement

GAC Education is committed to the highest standard of safeguarding. As an education recruitment agency, our primary duty is to ensure that every candidate we place is vetted to the highest possible standard and understands their personal responsibility to protect the welfare of children in line with Keeping Children Safe in Education (KCSIE) 2026.

2. Core Principles and Commitment

- **Responsibility:** Safeguarding is the responsibility of every adult working for or through GAC Education.
- **Equal Protection:** All children, regardless of age, disability, gender identity, or heritage, have an equal right to protection from harm or abuse.
- **Culture of Vigilance:** We maintain an open and transparent culture that enables staff to raise concerns about children or the processes within the organisation.
- **Compliance:** Failure to act in accordance with this policy may result in disciplinary action or termination of contract.

3. Statutory Framework

This policy is reviewed at least every 12 months to ensure compliance with:

- Keeping Children Safe in Education (KCSIE) 2025/26.
- Working Together to Safeguard Children 2023.
- REC Audited Education and Compliance+ standards.
- The Prevent Duty (2023) and The Children Act 1989/2004.

4. The Role of the Designated Safeguarding Lead (DSL)

The role of the Designated Safeguarding Lead (DSL) and their deputies within our safeguarding framework is central to maintaining the safety of children and adults at risk. Based on the standards of our peer organisations and statutory guidance, their responsibilities include:

- **Vetting Compliance:** Ensuring that all staff and candidates are fully vetted in accordance with strict company compliance procedures before being placed in a position of trust.
- **Detailed Record Keeping:** Maintaining confidential, accurate, and highly detailed records of every concern, report, or referral related to candidates or the children they work with.
- **Multi-Agency Liaison:** Acting as the primary point of contact for external agencies, including Children's Social Care, the Police, and the Local Authority's Designated Officer (LADO).
- **Expert Support:** Serving as a dedicated source of support, advice, and expertise for staff and candidates, particularly when they are involved in safeguarding incidents or need to challenge unsafe practices.
- **Training Oversight:** Ensuring that all relevant staff and candidates receive safeguarding training appropriate to their specific roles and continue to receive ongoing development to maintain best practices.
- **DBS Referrals:** Completing and managing necessary referral documents to the Disclosure and Barring Service (DBS) when a staff member or candidate is deemed to pose a risk to children.
- **Policy Development:** Overseeing the annual review and update of all safeguarding policies to ensure they reflect current statutory guidance and best practice.

5. Designated Safeguarding Lead (DSL)

- **School DSL:** Within the education setting, the DSL is usually a designated member of the Senior Leadership Team (SLT). Candidates must identify the DSL at every new placement as part of their induction. If a candidate is in doubt regarding a safeguarding concern, they should seek immediate clarification from the setting's DSL or report directly to the Principal/Headteacher.
- **Agency DSL:** Matthew Shone
- **Contact Details:** 0113 460 1938 / dsl@gac-education.com
The Agency DSL is responsible for overseeing the Vetting Passport system,

handling allegations against candidates, and acting as the point of contact for school DSLs and Local Authority Designated Officers (LADO).

- *In the event that an allegation is made against the Agency DSL, the matter must be reported directly to the Principal of the placement school and the Local Authority Designated Officer (LADO).*

6. Recognising Abuse and Detailed Definitions of Abuse

Staff must be alert to the four main categories of abuse and must be vigilant in identifying various forms of harm, including:

- Physical Abuse: Hitting, shaking, or deliberately inducing illness (Fabricated or Induced Illness).
- Emotional Abuse: Persistent maltreatment that conveys to a child they are worthless or unloved.
- Sexual Abuse: Forcing or enticing a child into sexual activities, including non-contact activities like grooming or producing sexual images.
- Neglect: Persistent failure to meet basic physical, emotional, or educational needs.
- Cumulative Neglect: Candidates must be alert to the "cumulative" nature of neglect. A series of small concerns, which in isolation may seem minor, can collectively indicate a significant safeguarding risk that requires immediate reporting.
- Contextual Risks: Including Child Criminal Exploitation (CCE), County Lines, and Grooming.
- Online Safety: Vigilance against cyberbullying, sextortion, and exposure to harmful material.

7. Enhanced Definitions of Abuse Nuances

To ensure candidates have a granular understanding of maltreatment, the following definitions are applied:

- Physical Abuse: This involves hitting, shaking, throwing, poisoning, burning, scalding, drowning, or suffocating a child. It specifically includes Fabricated or Induced Illness, where a parent or carer fabricates symptoms or deliberately induces illness in a child.
- Emotional Abuse: This is the persistent emotional maltreatment of a child causing severe adverse effects on their development. It includes conveying to a child that they are worthless or unloved, "deliberately silencing them," or "making fun" of what they say or how they communicate.



- Domestic Abuse: Staff must be aware that a child "witnessing" domestic abuse—including hearing or seeing the effects of physical, emotional, or financial abuse between adults in the home—is a victim of abuse in their own right and is categorised under Emotional Abuse.
- Sexual Abuse: This involves forcing or enticing a child to take part in sexual activities. This explicitly includes non-contact activities such as involving children in looking at or producing sexual images, watching sexual activities, or grooming a child in preparation for abuse.

8. Contextual and Extra-Familial Harms

We recognise that children face risks outside the family home, including:

- Child Criminal Exploitation (CCE) & County Lines: Coercing children into criminal activity or drug trafficking.
- Cuckooing: Candidates must be alert to signs of "cuckooing," where professional criminals take over a vulnerable person's (or child's) home to use it as a base for drug trafficking or criminal activity. Signs include a child suddenly having "new friends" who are older or having access to multiple properties.
- Sextortion: Financially motivated extortion involving sexual imagery.
- Peer-on-Peer (Child-on-Child) Abuse: Including bullying, sexual harassment, and "upskirting".
- Radicalisation: The process by which an individual supports extremist ideologies or terrorism.

9. Peer-on-Peer (Child-on-Child) Specifics

GAC Education maintains a zero-tolerance approach to child-on-child abuse, which can occur both inside and outside of the school setting. Specific harms include:

- Initiation/Hazing: Violence and rituals used as a way of initiating a person into a group.
- Downblousing: Taking a picture inside a person's clothing or from above looking down their chest without permission to obtain sexual gratification or cause distress.
- Upskirting: Taking pictures under a person's clothing without permission.

10. Expanded Signs & Indicators

Candidates must utilise "professional curiosity" to identify the following red flags:

- Behavioural Red Flags: Indicators include being "overly affectionate towards strangers" (particularly in pre-schoolers), "running away or regularly going missing from home/care", and "showing changes in eating habits or developing eating disorders".
- Criminal Exploitation (CCE): Signs include children appearing with "unexplained gifts or new possessions", misusing drugs/alcohol, or associating with older individuals or groups involved in exploitation.
- Child Trafficking: Candidates should look for children who "give a prepared story which is very similar to stories given by other children", "rarely leave the house," have "limited freedom of movement," or "not have any kind of documents".

11. Mental Health as a Safeguarding Trigger

GAC Education recognises that mental health concerns can be a significant indicator that a child has suffered or is at risk of suffering abuse, neglect, or exploitation.

- Observation and Vigilance: Staff and candidates must be alert to behavioural signs, such as sudden underachievement, lack of concentration, or mood regression, that suggest a child is experiencing a mental health problem.
- Reporting Requirement: If a mental health concern is also a safeguarding concern, candidates must take immediate action by reporting it to the school DSL and the GAC Education DSL.
- Professional Boundaries: While staff are not expected to diagnose conditions, they must treat extreme outbursts, self-harm, or withdrawal as reportable safeguarding observations rather than purely pastoral issues.

12. Identification of Specific Vulnerable Groups

To ensure "professional curiosity," GAC Education provides special consideration to specific groups of children who are statistically at a higher risk of abuse or maltreatment.

- High-Risk Categories: Candidates must be particularly vigilant when working with:
 - Looked After Children (LAC) and previously Looked After Children.
 - Young Carers.
 - Children living in temporary accommodation or homeless situations.
 - Children with Special Educational Needs and Disabilities (SEND), who may be less able to express what is happening to them.

- Children with family members in prison or those affected by parental incarceration.
- Children who are asylum seekers or do not have English as a first language.

13. Private Fostering Arrangements (PFA)

A Private Fostering Arrangement occurs when a child under 16 (or under 18 if disabled) is cared for by someone other than a parent or close relative for 28 days or more.

- Definition of Close Relative: A close relative is strictly defined as a grandparent, brother, sister, uncle, or aunt (including half-siblings and stepparents). It does not include cousins, great-aunts, or great-uncles.
- Mandatory Duty to Report: Candidates have a legal duty to inform the school DSL and GAC DSL if they suspect a PFA.
- Vulnerability: Privately fostered children are a potentially vulnerable group who must be monitored by the local authority, as these arrangements can sometimes involve modern-day slavery or trafficking.

14. Forced Marriage & FGM Mandatory Reporting

GAC Education maintains a zero-tolerance approach to these crimes.

- Forced vs. Arranged Marriage: Candidates must distinguish between Arranged Marriage, where both parties freely consent, and Forced Marriage, where one or both participants are coerced through physical or emotional threats. Forced marriage is a serious abuse of human rights and a criminal offence.
- FGM Mandatory Reporting Duty: If a candidate "knows" (sees or hears a disclosure) that an under-18 has undergone Female Genital Mutilation, they have a personal legal duty to report this directly to the POLICE.
- Safeguarding Procedure: Suspected cases of being at risk of FGM should follow the standard safeguarding report to the DSL.

15. The "Body Map" Protocol

In the event of a concern or disclosure relating to physical abuse, a formal procedure for recording marks must be followed.

- Documentation: Candidates must provide a detailed written description of the injury, including its size, colour, condition (e.g., deteriorating or healing), and exactly where it is located on the child.
- Visual Mapping: All staff must complete the GAC Education Child Protection Body Map to visually record mark locations.



- **Submission:** A copy of the body map and written description must be provided to both the school DSL and the GAC Education DSL (dsl@gac-education.com) immediately.
- **Observation context:** The report must include any explanations given by the child or parent and observations of the child's emotional state (e.g., indifferent or distressed) regarding the injury.

16. Response and Reporting Procedures

If a child makes a disclosure, staff must:

1. **Listen:** Allow them to speak without interruption and use their own words.
2. **Transparency:** Advise that you cannot keep the information secret.
3. **Reassurance:** Reassure the child that although you may need to pass anything they say on, this is for their benefit.
4. **Safety:** Ensure the child is not in immediate danger.
5. **Report:** Notify the placement setting's DSL immediately. Also notify the GAC DSL.
6. **Record:** Complete a detailed written record, including a Body Map for physical injuries.
7. **Out-of-Hours:** If a risk of significant harm exists outside of office hours, staff must contact Emergency Services (999) or local Children's Social Care directly.
8. **Ongoing Support:** GAC Education recognises that our duty doesn't end with a report. If requested by the school or local authority, GAC will support the candidate in providing statements for Child Protection Conferences or Early Help assessments to ensure a holistic view of the child's safety.

17. Low-Level Concerns

- **Low-Level Concerns:** We encourage the reporting of "nagging doubts"—behaviours that are inconsistent with our Code of Conduct but do not meet the harm threshold.
- **DBS Referral:** We have a legal duty to refer individuals to the DBS if they are dismissed or leave while posing a risk to children.

18. Allegations Against Staff



Any concern or allegation that a staff member or candidate has behaved in a way that has harmed a child, or may have harmed a child, must be treated with the utmost urgency:

- Primary Reporting: Allegations must be reported to the Designated Safeguarding Lead (DSL) immediately.
- Escalation Path: In the event that the staff member posing a risk is the DSL, the Principal or Headteacher must be informed immediately.
- Further Escalation: In the unlikely event that both the DSL and the Principal/ Headteacher pose a risk, or if the concern involves the Headteacher, the Chair of Governors and the Local Authority Designated Officer (LADO) must be contacted.
- Emergency Situations: If a child is in immediate danger, the police must be informed immediately.

- Referrals to the LADO must be made as soon as possible and no later than 24 hours after the initial concern/allegation is raised.
- Allegations that a staff member has harmed or poses a risk to a child must be referred to the LADO no later than 24 hours after the initial concern/allegation is raised.
- GAC will cooperate fully with any investigation led by the school or local authority.
- Duty to Refer: GAC has a legal duty to report individuals to the DBS if they are deemed unsuitable to work with children.

19. Allegations Management

If an allegation is made against a GAC candidate while on placement:

1. Immediate Suspension: The candidate is immediately removed from all bookings and "blocked" on our system.
2. LADO Notification: GAC Education will cooperate fully with the school and the Local Authority Designated Officer (LADO).
3. Internal Investigation: A formal review is led by the GAC DSL.
4. DBS Referral: If a candidate is removed because they have harmed a child or pose a risk, GAC Education has a legal duty to refer the matter to the Disclosure and Barring Service (DBS).

20. Whistleblowing



- GAC promotes an open and honest culture where staff feel safe to voice concerns about unsafe practices.
- Refer to the standalone Whistleblowing Policy for external support organisations.

21. Legislation & Guidance

This policy is strictly based on the following statutory frameworks:

- Keeping Children Safe in Education (KCSIE) (latest version).
- Working Together to Safeguard Children.
- REC Audited Education standards for recruitment agencies.
- The Children Act 1989 and 2004.
- The Prevent Duty 2023.

22. Safer Recruitment & Vetting

In accordance with KCSIE 2026 and the GCA Framework, no candidate will be placed without the following checks:

- Enhanced DBS & Barred List: Verified via the Update Service every six months.
- Prohibition from Teaching: We check the TRA (Teaching Regulation Agency) for all teachers to ensure they are not subject to a prohibition order.
- Section 128 Check: For all candidates placed in management or leadership roles (including certain roles in Independent Schools/Academies), we perform a Section 128 check to ensure they are not prohibited from the management of schools.
- Online Due Diligence: A formal "Social Media & Digital Footprint" check is conducted for all new registrations to identify any content inconsistent with the profession (e.g., extremist views or misconduct).
- Overseas Checks: If a candidate has lived outside the UK for six months or more in the last ten years, a Certificate of Good Conduct (Overseas Police Check) is mandatory.
- Vetting Passport: Schools are provided with a full "Vetting Letter" via our unbundled portal before a placement begins.

Referencing & Employment History:



- **Minimum Requirement:** We obtain at least two professional references. These must collectively cover a minimum of the previous 24 months of employment or training.
- **Primary Reference:** One reference must always be from the most recent employer. Where the candidate has previously worked with children, a reference must be obtained from that specific employer (if not the most recent).
- **Direct Contact:** References must be obtained directly from the referee. We do not accept open references (e.g., "to whom it may concern" letters) or those provided by the candidate.
- **Authenticity Verification:** We verify the authenticity of every reference author. This includes confirming the reference originated from a legitimate professional email domain and/or a "call-back" to the organisation's verified switchboard to confirm the referee's identity and the content of the reference.
- **Gap Analysis:** A full, chronological employment history is required since the age of 18. Any gaps in employment exceeding four weeks must be documented, investigated, and a satisfactory explanation recorded.

Right to Work (RTW) Verification:

- **Statutory Excuse:** We conduct a Right to Work check for every candidate before they are cleared for placement. This is done to establish a 'statutory excuse' against illegal working under the Immigration, Asylum and Nationality Act 2006.
- **Digital Verification (IDVT):** For British and Irish citizens with valid passports, we use a certified Identity Service Provider (IDSP) to perform a digital identity check. This includes biometric 'liveness' testing to ensure the document is genuine and belongs to the candidate.
- **Non-UK/Irish Citizens:** For candidates with a 'Share Code,' we perform a Home Office online check. We verify the photograph on the Home Office portal against the candidate in person or via a live video link to ensure it is a true likeness.
- **Manual Checks:** Where digital checks are not possible, we conduct a manual check by physically holding the original document and verifying its authenticity in the presence of the candidate.
- **Frequency:** RTW checks are repeated whenever a candidate's visa is subject to expiry.

23. Administrative Safeguarding Safeguards

To satisfy REC Audited requirements, GAC Education implements the following administrative controls:

- **Compromise Agreements:** GAC Education will not make any compromise or settlement agreement in the case of a person deemed unsuitable to work with



children. Any agreement containing a condition of not referring a case to the DBS constitutes a criminal offence.

- Reference Verification: We verify the "authenticity of every reference author". This is achieved by confirming the reference originated from a legitimate professional email domain or by conducting "call-back" checks to the organisation's verified switchboard to confirm the referee's identity.

24. Candidate Requirements (Statutory Compliance)

All GAC Education candidates are required to adhere to the following mandates as a fundamental condition of their registration and ongoing placement:

- Statutory Reading: Candidates must provide written confirmation that they have read, understood, and accepted the responsibilities outlined in Part One of the latest Keeping Children Safe in Education (KCSIE) guidance.
- Mandatory Annual Training: To maintain professional competency, all candidates must successfully complete GAC-approved training modules annually. This includes, but is not limited to:
 - Safeguarding Level 1 & 2: Identifying and responding to signs of abuse and neglect.
 - The Prevent Duty: Recognising indicators of radicalisation and extremism.
 - FGM Mandatory Reporting: Understanding the legal duty to report known cases of female genital mutilation directly to the police.
- Professional Boundaries: Candidates must act in accordance with a professional Code of Conduct at all times to maintain appropriate boundaries and safe working practices.
- Reporting of "Low-Level" Concerns: Candidates are required to report any "low-level" concern—defined as any behaviour that causes a sense of unease or "nagging doubt".
 - School Reporting: Such concerns regarding colleagues or setting staff must be reported immediately to the School DSL.
 - Agency Reporting: Candidates must also notify the GAC Education DSL of the report to ensure a comprehensive audit trail and appropriate agency support.
- Institutional Induction: Upon arrival at any new placement, candidates are expected to familiarise themselves immediately with the specific safeguarding arrangements and the identity of the Designated Safeguarding Lead (DSL) for that organisation.

- **Duty of Disclosure:** Candidates have a continuous duty of care to notify GAC Education of any changes in their personal life that may affect their suitability to work in a Position of Trust, such as new allegations, criminal investigations, or Social Care involvement within their own family.
- **Position of Trust:** Candidates are briefed that it is a criminal offence to engage in sexual activity with a child under 18 if they are in a "Position of Trust" (under the Sexual Offences Act 2003), regardless of the child's age of consent or apparent willingness.
- **Whistleblowing:** Where a candidate believes a safeguarding concern has not been responded to appropriately within a setting, they must seek advice and support from the GAC Education DSL or follow the procedures laid out in the Whistleblowing Policy.
- **Children Missing Education (CME)**
 - *Candidates must report to the school DSL if they become aware of a child who is missing education (CME), particularly if the child has unexplained absences or has moved without a known destination.*

25. Key 2026/27 Focus Areas for Supply Staff

As part of our commitment to maintaining an open and transparent culture, GAC Education ensures that all candidates are fully briefed on current safeguarding developments and auditing activities. Our 2026 focus areas are designed to meet statutory responsibilities and reflect best practice requirements.

Focus Area	Expectation for GAC Candidates
Mobile Phones	To maintain professional boundaries and safe working practices, GAC candidates must not have phones visible or in use during the school day. Taking photographs of children on a mobile phone is strictly contrary to policy and must be reported as a concern.
AI & Technology	Technology can be used to facilitate abuse, including the production of sexual images or AI-assisted technology. Candidates must report any suspected AI-generated imagery involving pupils immediately to the school DSL.

Gender Questioning	In line with providing safe and effective care, candidates must remain neutral and sensitive to the diverse circumstances of all children. GAC staff must provide a safe space for the LGBTQ+ community to share concerns while ensuring that information is shared strictly on a 'need-to-know' basis with the DSL to safeguard the child.
Child-on-Child Abuse	GAC Education has a zero-tolerance approach to all forms of abuse, including misogyny, sexual harassment, and discriminatory bullying. Candidates must be vigilant against "banter" that crosses into sexual violence or harassment and must never dismiss or tolerate such behaviors as an inevitable part of growing up.

26. Additional Safeguarding Obligations for GAC Candidates

- **Contextual Awareness:** Candidates must use professional curiosity to spot potential signs of abuse, neglect, and exploitation both online and offline.
- **Vulnerability Recognition:** Special consideration must be given to children who are particularly vulnerable, such as those with SEND or those living in chaotic home situations.
- **Low-Level Concerns:** Candidates must report any behaviour—even if it appears insignificant or only causes a "nagging doubt"—that is inconsistent with the staff code of conduct.
- **Immediate Action:** If a candidate believes a child is at risk of significant harm, they must take action early rather than waiting for a problem to escalate.

27. Safeguarding Adults at Risk

While our primary focus is the protection of children, GAC Education recognises that our staff may be placed in settings involving adults who require additional protection.

- **Definition:** The term 'adult at risk' is used to replace 'vulnerable adult' to ensure the fault of abuse is not implied to lie with the victim. We define an 'adult at risk' as any person aged 18 or over who may be in need of community care services by reason of mental or other disability, age, or illness.
- **Consent and Capacity:** When considering signs of abuse in adults, particularly those with SEND, staff must not 'infantilise' or 'desexualise' them. Consent is the primary factor in determining abuse; staff must be alert to any sexual activity that a person lacks the capacity to consent to.
- **Recognising Abuse in Adults:** Indicators of abuse in adults at risk may include:

- Sexual Abuse: Inappropriate touch, non-consensual masturbation, or being provided with intimate personal care when it is not necessary.
 - Financial Exploitation: A person appearing short of cash despite having a job or speaking of needing to 'repay a debt or favour'.
 - Grooming: A noticeable imbalance of power between an adult with SEND and a new 'friend' or partner.
- Reporting Procedures for Adults:
 - Any disclosure from an adult at risk must be treated seriously and reported immediately to the setting's DSL and the GAC Education DSL.
 - If a concern arises out of hours, staff must contact local **Adult Social Care** or Emergency Services.
 - Candidates must observe the specific safeguarding and child protection policies of the education settings in which they are placed, which often extend to the vulnerable adults in their care.

28. Actionable "Body Map" Protocol

When a concern or disclosure relates to physical abuse, candidates must record the following details immediately for the GAC and School DSLs:

- Injury Condition: Documentation must specify the condition of the injury, noting if it is "deteriorating or getting better".
- Detailed Description: This must include the "colour, shape, size, and condition" of the mark.
- Child's Reaction: Candidates must record if the child is in "distress or indifferent about the injury" and include any explanations provided by the child or parent.

29. Data Protection, Data Retention & Records

GAC Education ensures that all safeguarding and vetting data is managed in strict accordance with statutory requirements and best practice frameworks.

- General Vetting Records: In alignment with UK GDPR and REC standards, core vetting records—including references, proof of identity, and professional qualifications—are retained for the duration of the candidate's registration plus seven years to meet statutory, auditing, and insurance obligations.



- **DBS Certificate Data:** In strict accordance with the DBS Code of Practice, physical or digital copies of DBS certificates are retained for no longer than six months.
- **The Single Central Record (SCR):** We maintain a permanent, accurate record of the date each check was completed, the certificate number, and the name of the individual who verified the documentation. This data is kept for the duration of the candidate's registration plus seven years to provide a clear and transparent audit trail for schools, nurseries, and regulatory bodies.
- **Information Sharing:** Safeguarding records are maintained and securely stored; however, the public interest in safeguarding children may override confidentiality interests, and information will be shared with appropriate authorities or other recruitment firms on a "need-to-know" basis.
- **Secure Storage:** All documentation is kept securely within a restricted-access environment (such as a hosted SharePoint), utilising multi-factor authentication and rigorous cybersecurity protections to prevent unauthorised access.
- **Substantiated Allegation Records:** > While statutory guidance (KCSIE) requires retention until retirement age or for 10 years (whichever is longer), GAC Education adheres to the IICSA (Independent Inquiry into Child Sexual Abuse) recommendation for a "Gold Standard" audit trail.
- **Retention Period:** Records of substantiated safeguarding allegations will be retained for 75 years from the date of the allegation (or 70 years after the candidate's last contact with the agency).
- **Purpose:** This ensures that non-recent ("historic") abuse inquiries can be supported and that accurate information is provided in future regulatory references, even decades after the incident.
- **Exclusion:** Allegations found to be malicious will be removed from the candidate's file and destroyed immediately in accordance with statutory guidance.
- **Disposal:** Upon the conclusion of the mandatory retention period, all sensitive data is securely destroyed via professional shredding or permanent digital deletion.

30. Online Safety, Filtering & Monitoring

GAC Education recognises that the online world is an integral part of children's lives, but it also presents significant safeguarding risks. In line with **KCSIE 2026**, online safety is treated as a core safeguarding theme that is interrelated with all other forms of abuse.

30.1. Staff and Candidate Responsibilities

All GAC Education candidates have a statutory duty to:

- **Active Monitoring:** Be vigilant in the classroom and IT suites, ensuring that pupils are using technology for intended educational purposes only.
- **Identify Bypassing:** Report any instance where a pupil attempts to bypass the school's Filtering and Monitoring systems (e.g., using VPNs, proxy sites, or unauthorised hotspots).
- **Reporting Digital Harm:** Treat "online" concerns with the same urgency as "offline" physical concerns. This includes reports of cyberbullying, exposure to extremist content, or the sharing of intimate images.

30.2. Filtering and Monitoring Standards

- **System Awareness:** During induction, candidates must familiarise themselves with the school's specific monitoring software (e.g., CPOMS, Smoothwall, Senso, or Impero). Candidates are required to specifically ask for the school's Filtering & Monitoring reporting procedure as part of their Day 1 checklist.
- **Flagging Concerns:** If a candidate observes a "system flag" or a monitoring alert on a pupil's screen, this must be reported to the school DSL immediately, as it may indicate a pattern of concerning behaviour (e.g., searches for self-harm or radicalisation).

30.3. AI-Generated Harm and Deepfakes

- **Content Recognition:** Candidates must be alert to the risks posed by Generative AI. This includes "Deepfakes" (non-consensual AI-generated sexual imagery) or AI-assisted grooming.
- **Legal Duty:** Candidates are briefed that the possession or distribution of AI-generated "indecent images of children" is a criminal offence. Any suspicion that such content is being created or shared by pupils must be reported to the DSL and GAC DSL immediately.

30.4. Social Media and Professional Boundaries

- **No Personal Contact:** Candidates must not "friend," "follow," or communicate with any current or former pupil on any social media platform.
- **Digital Footprint:** Candidates must maintain a professional digital presence. Any online content posted by a candidate that is deemed to bring the profession into disrepute or violates GAC Education's Code of Conduct may lead to removal from the register.
- **Reporting Peers:** If a candidate becomes aware of a colleague engaging in inappropriate online behaviour with pupils, they must follow the Whistleblowing and Allegations against Staff procedures.



31. Modern Slavery & Human Trafficking

GAC Education maintains a zero-tolerance approach to modern slavery. We recognise our duty to ensure that our recruitment supply chains are free from exploitation. We conduct thorough face-to-face (or enhanced digital) interviews to look for signs of coercion, such as multiple candidates sharing the same bank account, address, or phone number, or candidates appearing to have their documents held by a third party.

32. Agency Internal Filtering & Monitoring

In line with our commitment to online safety, GAC Education implements its own internal filtering and monitoring systems. All internal staff are briefed that agency-owned hardware and networks are monitored to prevent the accessing of harmful or illegal content, ensuring that GAC staff remain suitable for their positions of trust.

33. The Tripartite Safeguarding Induction

GAC Education recognises that safeguarding is a joint responsibility. While we train our candidates, we legally require our partner schools (via our Terms of Business) to provide a site-specific induction. If a candidate is not offered an induction upon arrival, they are instructed to contact the GAC DSL immediately so we can formally request this from the setting.